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LESA, LLC
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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 OAKLAND DIVISION
11

12 **LESA, LLC**, a Delaware limited liability
company,
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14 Plaintiff;

15 v.

16 **FAMILY TRUST OF KIMBERLY AND ALFRED
MANDEL,**
17 **JAMES FISHER**, an individual,
CHRISTINE WILLIAMS, an individual,
18 **GREGORY ROSSMANN**, an individual,
ALFRED MANDEL an individual,
19 **ANDREW CHASE**, an individual,
and the **ANDREW CHASE 2005 REVOCABLE
TRUST UAD 3/29/05 AS AMENDED 5/10/20,**
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21 Defendants.
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Case No. 4:15-cv-05574-KAW

**STIPULATION AND [~~PROPOSED~~] ORDER
ENLARGING TIME RE: HEARING ON
DEFENDANTS' MOTION TO DISMISS AND
PARTIAL SUMMARY JUDGMENT.**

STIPULATION ENLARGING TIME RE: DEFENDANTS' MOTION TO DISMISS

This Stipulation is entered into by Plaintiff LESA, LLC and Defendants Family Trust of Kimberly and Alfred Mandel, Alfred Mandel, James Fisher, Christine Williams, Gregory Rossmann, Andrew Chase, and Andrew Chase 2005 Revocable Trust UAD 3/29/2005 as Amended 5/10/20 (collectively, "Defendants") by their respective counsel.

RECITALS

A. Plaintiff LESA, LLC filed its Complaint on December 4, 2015 (Dkt. 1).

B. Defendants filed their Motion to Dismiss Second Cause of Action of Second Amended Complaint for Failure to State a Claim (FRCP12(b)(6)) and Defendant Rossmann, Mandel, Fisher and Williams' Motion for Partial Summary Judgment on Third Cause of Action (FRCP 56) (the "Motion to Dismiss") on May 31, 2016 (Dkt. 33), set for hearing on September 1, 2016.

C. Plaintiff filed its Opposition to Defendants' Motion on June 14, 2016 (Dkt. 49).

D. Counsel for Plaintiff will not be available on September 1, 2016 for the Hearing on Defendants' Motion to Dismiss due to travel and other obligations.

E. Counsel for Defendants will not be available on September 15, 2016.

F. The Parties understand that the next available date for Law and Motion Hearing before the Honorable Kandis Westmore is November 3, 2016.

STIPULATION

To accommodate Counsel's various scheduling conflicts, the Parties hereby stipulate to modify the briefing schedule for the Motion as follows:

Hearing on Motion to Dismiss: Thursday, November 3, 2016

IT IS SO STIPULATED.

Dated: August 26, 2016

COMPUTERLAW GROUP LLP

By: /s/ Christopher Sargent
Jack Russo
Christopher Sargent

Attorneys for Plaintiff
LESA, LLC

1 Dated: August 26, 2016

ROYSE LAW FIRM, PC

2 By: /s/ Thomas Moore
3 Thomas Moore
4 Lisa M. Chapman

5 Attorneys for Defendants
6 ALFRED MANDEL, JAMES FISHER, CHRISTINE
7 WILLIAMS, & GREGORY ROSSMANN

8 Dated: August 26, 2016

WALL LAW FIRM

9 By: /s/ J. Joseph Wall, Jr.
10 J. Joseph Wall, Jr.

11 Attorney for Defendants
12 ANDREW CHASE & ANDREW CHASE 2005
13 REVOCABLE TRUST UAD

14 **ATTESTATION OF E-FILED SIGNATURE**

15 I, Christopher Sargent, am the ECF user whose ID and password are being used to file
16 this declaration. In compliance with Civil L.R. 5-1(i)(3), I hereby attest that Thomas Moore and
17 J. Joseph Wall, Jr. have concurred in this filing's content and has authorized this filing.

18 Dated: August 26, 2016

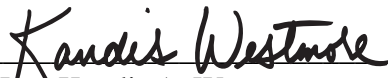
19 By: /s/ Christopher Sargent
20 Christopher Sargent

[PROPOSED] ORDER

Pursuant to Parties' Stipulation, Defendants' Motion to Dismiss hearing date is moved from September 1, 2016 to November 3, 2016.

SO ORDERED.

Dated: 8/25, 2016


Hon. Kandis A. Westmore
United States Magistrate Judge